

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

HH ST. LOUIS RAILWAY LP, and)	
RAILWAY EXCHANGE OWNER, LLC,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:18-cv-01132
)	
AFFILIATED FM INSURANCE COMPANY,)	
)	JURY TRIAL DEMANDED
Defendant.)	

DEFENDANT’S MOTION FOR LEAVE TO FILE CORRECTED
EXHIBIT AND FOR LEAVE TO FILE SAME UNDER SEAL

Defendant Affiliated FM Insurance Company (“Affiliated FM”) respectfully requests leave to file corrected Exhibit E to its Notice of Removal, and for leave to file same under seal.

In support thereof, Affiliated FM states as follows:

1. Affiliated FM filed its Notice of Removal and related documents on July 10, 2018.
2. In connection with its Notice of Removal, Affiliated FM moved for leave to file an unredacted copy of its Notice of Removal and certain exhibits thereto, including Exhibit E, under seal as they contain confidential information and are subject to a previously issued protective order. (ECF #2).
3. The Court granted Affiliated FM’s Motion for Leave to File Redacted Notice of Removal, and For Leave to File Exhibits B, E, and J-2 Thereto under Seal on July 13, 2018. (ECF #14).
4. Affiliated FM recently discovered that it had inadvertently filed an incorrect document as Exhibit E to its Notice of Removal.

5. Affiliated FM therefore seeks leave to file corrected Exhibit E to its Notice of Removal.

6. Because corrected Exhibit E contains confidential information that is subject to a previously issued protective order, Affiliated FM seeks leave to file same under seal.

7. Plaintiffs will not be prejudiced by the granting of this Motion.

WHEREFORE, Defendant Affiliated FM Insurance Company prays that the Court grant it leave to file corrected Exhibit E to its Notice of Removal under seal, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

TUCKER ELLIS LLP

By: /s/ Sandra J. Wunderlich

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**ATTORNEYS FOR DEFENDANT
AFFILIATED FM INSURANCE
COMPANY**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 25th day of July, 2018 a true and correct copy of the foregoing instrument was electronically filed with the Clerk of Court and served to all counsel of record via the Court's CM/ECF System.

/s/ Sandra J. Wunderlich

Attorney for Defendant

Affiliated FM Insurance Company